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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	CASE NO. CR 14-00175 (THE)
)	
PLAINTIFF,)	STIPULATION AND PROPOSED ORDER TO
)	EXCLUDE TIME
v.)	
)	
PACIFIC GAS AND ELECTRIC COMPANY,)	
)	
DEFENDANT.)	

With the agreement of the parties in open court on June 2, 2014, and with the consent of the defendant Pacific Gas And Electric Company ("defendant"), the Court enters this order 1) ordering the next appearance in front of this Court on August 18, 2014 at 2:30 p.m. for a status conference, and 2) documenting the exclusion of time under the Speedy Trial Act, 18 U.S.C. § 3161, from June 2, 2014 to August 18, 2014 at 2:30 p.m. The parties agree, and the Court finds and holds, as follows:

1. The Court finds that, taking into the account the public interest in the prompt disposition of criminal cases, excluding time until August 18, 2014 is necessary because the case is complex, see 18 U.S.C. § 3161(h)(7)(A) & (B)(ii), and for effective preparation of counsel and for continuity of counsel.

STIPULATION TO EXCLUDE TIME
CASE NO. CR 14-00175

See 18 U.S.C. § 3161(h)(7)(A) & (B)(iv). The government indicted this case on April 1, 2014. The case involves allegations of violations of the Pipeline Safety Act stemming from defendant's gas operations. Discovery in this case involves millions of pages of documents, coming from various entities. The government has provided two document productions to date and will likely follow up with a third production that will need to be reviewed by the defense. In addition, the parties have discovery issues to resolve based on both the current government productions and privilege issues. Accordingly, the Court finds that the ends of justice served by excluding the period from June 2, 2014, to August 18, 2014, outweigh the best interest of the public and the defendant in a speedy trial. *Id.* § 3161(h)(7)(A) & (B)(iv).

2. Accordingly, and with the consent of the defendant, the Court orders that 1) defendant shall make its next appearance in front of this court on August 18, 2014, at 2:30 p.m. for further status; and 2) the period from June 2, 2014, to August 18, 2014, be excluded from Speedy Trial Act calculations under 18 U.S.C. § 3161 (h)(7)(A) & (B)(ii) & (iv).

IT IS SO STIPULATED.

DATED: June 13, 2014 _____

/s/ _____
Steven M. Bauer, Esq.
Attorney for Pacific Gas And Electric Company

DATED: June 13, 2014 _____

/s/ _____
Walter F. Brown, Esq.
Attorney for Pacific Gas And Electric Company

DATED: June 13, 2014 _____

/s/ _____
Stacey P. Geis
Assistant U.S. Attorney

IT IS SO ORDERED.

DATED: June 16, 2014

